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11 *Attorneys for Plaintiff, The Bank of New York Mellon, f/k/a The Bank of New York, as Trustee for
12 the Certificateholders of the CWALT, Inc., Alternative Loan Trust 2006-OA2 Mortgage Pass-
13 Through Certificates, Series 2006-OA2*

14 **UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA**

16 THE BANK OF NEW YORK MELLON,
17 F/K/A THE BANK OF NEW YORK, AS
18 TRUSTEE FOR THE CERTIFICATE-
19 HOLDERS OF THE CWALT, INC.,
20 ALTERNATIVE LOAN TRUST 2006-OA2
21 MORTGAGE PASS-THROUGH
22 CERTIFICATES, SERIES 2006-OA2,

23 Plaintiff,

24 vs.

25 NORTH AMERICAN TITLE INSURANCE
26 COMPANY, DOE INDIVIDUALS I through
XX; and ROE CORPORATIONS XI through
XX, inclusive,

Defendants.

Case No.: 2:21-cv-00395-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE A
~~PROPOSED~~ DISCOVERY PLAN**

(Second Request)

27 Plaintiff, The Bank of New York Mellon, f/k/a The Bank of New York, as Trustee for the
28 Certificateholders of the CWALT, Inc., Alternative Loan Trust 2006-OA2 Mortgage Pass-
Through Certificates, Series 2006-OA2 (“BONY”) and Defendant, North American Title
Insurance Company (“NATIC”), by and through their undersigned counsel, stipulate and agree
as follows:

1. On March 8, 2021, BONY filed its Complaint in Eighth Judicial District Court, Case No.
A-21-830741-C [ECF No. 1-1];

- 1 2. On March 10, 2021, NATIC filed a Petition for Removal to this Court [ECF No. 1];
- 2 3. On May 6, 2022, the Court ordered that the stay of the instant action shall be extended
- 3 while the parties discuss potential settlement [ECF No. 14]. The Parties were ordered to
- 4 file a Joint Status Report ninety (90) days after entry of the order. *Id.*;
- 5 4. On November 2, 2022, the Parties filed a Joint Status Report advising the Court that the
- 6 Parties attended a private mediation on September 29, 2022, which did not result in
- 7 settlement. The Parties requested thirty (30) days to submit their proposed discovery plan
- 8 [ECF No. 16];
- 9 5. On December 1, 2022, the Parties requested an extension until January 3, 2023 to submit
- 10 their proposed discovery plan as BONY's counsel was preparing for an oral argument
- 11 with the Ninth Circuit, which was granted by the Court [ECF No. 22];
- 12 6. The Parties request an additional thirty (30) day extension until February 2, 2023 to submit
- 13 their proposed discovery plan, as BONY's counsel needs additional time to confer with
- 14 its client in light of the recent holidays.
- 15 7. Counsel for NATIC does not oppose the requested extension;

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1 8. This is the second request for an extension which is made in good faith and not for
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 3rd day of January, 2023.

5 WRIGHT, FINLAY & ZAK, LLP

6 /s/ Lindsay D. Dragon, Esq.

7 Lindsay D. Dragon, Esq.
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9 7785 W. Sahara Ave., Suite 200
10 Las Vegas, Nevada 89117
11 *Attorneys for Plaintiff, The Bank of New
12 York Mellon, f/k/a The Bank of New York, as
13 Trustee for the Certificateholders of the
14 CWALT, Inc., Alternative Loan Trust 2006-
15 OA2 Mortgage Pass-Through Certificates,
16 Series 2006-OA2*

17 DATED this 3rd day of January, 2023.

18 SINCLAIR BRAUN LLP

19 /s/ Kevin S. Sinclair, Esq.

20 Kevin S. Sinclair, Esq.
21 Nevada Bar No. 12277
22 16501 Ventura Blvd, Suite 400
23 Encino, California 91436
24 *Attorneys for Defendant, North American
25 Title Insurance Company*

26 IT IS SO ORDERED.



27 Cam Ferenbach
28 United States Magistrate Judge

29 DATED 1-4-2023